



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-3

February 15, 2001

Carson Ross, Treasurer
Graves for Congress
110 South 10th Street
Tarkio, MO 64491

Identification Number: C00359034

Reference: 30 Day Post-General Report (10/1/00-11/27/00)

Dear Mr. Ross:

This letter is to inform you that as of February 14, 2001, the Commission has not received your response to our request for additional information, dated January 24, 2001. This notice requests information essential to full public disclosure of your federal election campaign finances. To ensure compliance with the provisions of the Federal Election Campaign Act (the Act), please respond to this request (copy enclosed).

An adequate response must be received at the Commission by March 7, 2001. Adequate responses received on or before this date will be taken into consideration in determining whether audit action will be initiated. **Requests for extensions of time in which to respond will not be considered.** Failure to provide an adequate response by this date may result in an audit of the committee. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action.

If you should have any questions regarding this matter, please contact Christopher A. Whyrick on our toll-free number (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division) or our local number (202) 694-1130.

Sincerely,

A handwritten signature in dark ink, appearing to read "John D. Gibson".

John D. Gibson
Assistant Staff Director
Reports Analysis Division

Enclosure



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

Carson Ross, Treasurer
Graves for Congress
110 South 10th Street
Tarkio, MO 64491

JAN 24 2001

Identification Number: C00359034

Reference: 30 Day Post-General Report (10/1/00-11/27/00)

Dear Mr. Ross:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Your report contains financial activity disclosed on a previous report. Overlapping coverage dates create difficulties in tracking the committee's cash flow. Please amend this report to include only the financial transactions that occurred between 10/19/00 and 11/27/00. (2 U.S.C. §434(b))

-Column B figures for the Summary and Detailed Summary Pages should equal the sum of the Column B figures on your previous report and the Column A figures on this report. Please file an amendment to your report to correct the Column B discrepancies and all subsequent report(s) which may be affected by this correction.

-The beginning cash balance of this report does not equal the ending balance of your 12 Day Pre-General report. Please correct this discrepancy and amend all subsequent reports(s) which may be affected by the correction.

-Your committee filed 48 hour notices reporting the following "last minute" contributions:

GRAVES FOR CONGRESS
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<u>Contributor</u>	<u>Date</u>	<u>Amount</u>
Jay Reed	10/19	\$1,000.00
A. Landes	10/25	\$1,000.00
Charles Sharp	10/27	\$1,000.00
Phillip Orschelm	10/27	\$1,000.00
Robert Loch, Jr.	10/27	\$1,000.00
John Edgar	10/27	\$1,000.00
Michael Ketchmark	11/03	\$3,000.00
David Bradley	11/03	\$1,000.00

These contributions do not appear on Schedule A of this report. Please amend your report to include these contributions or provide an explanation of these apparent discrepancies.

-Schedule A of your report indicates that your committee may have failed to file one or more of the required 48 hour notices regarding "last minute" contributions received by your committee after the close of books for the 12 Day Pre-General report. A principal campaign committee must notify the Commission, in writing, within 48 hours of any contribution of \$1,000 or more received between two and twenty days before an election. These contributions are then reported on the next report required to be filed by the committee. To ensure that the Commission is notified of last minute contributions of \$1,000 or more to your campaign, it is recommended that you review your procedures for checking contributions received during the aforementioned time period. Although the Commission may take legal action, any response you wish to provide concerning this matter will be considered. (11 CFR §104.5(f))

-On Schedule A of this report, you have not itemized all of the necessary contributor information. You must provide the date, aggregate year-to-date total, election designation, amount of contribution, and partnership attribution (if necessary) for each itemized receipt. (11 CFR §104.3(a)(4)(i)) Please amend your report to include the aggregate year-to-date total.

-Commission Regulations require that a committee disclose the identification of all individuals who contribute in excess of \$200 in a calendar year. (11 CFR §104.3(a)(4)(i)) Identification for an individual is defined as the full name, mailing address, occupation and name of employer. (11 CFR §100.12) Your report discloses contributions from

individuals for which the identification is not complete.

You must provide the missing information, or if you are unable to do so, you must demonstrate that "best efforts" have been used to obtain the information. To establish "best efforts," you must provide the Commission with a detailed description of your procedures for requesting the information. Establishing "best efforts" is a three-fold process.

First, your original solicitation must include a clear and conspicuous request for the contributor information and must inform the contributor of the requirements of federal law for the reporting of such information. (11 CFR §104.7(b)(1))

Second, if the information is not provided, you must make one follow-up, stand alone effort to obtain this information, regardless of whether the contribution(s) was solicited or not. This effort must occur no later than 30 days after receipt of the contribution and may be in the form of a written request or an oral request documented in writing. (11 CFR § 104.7(b)(2))
The request must:

- clearly ask for the missing information, without soliciting a contribution;
- inform the contributor of the requirements of federal law for the reporting of such information, and
- if the request is written, include a pre-addressed post card or return envelope.

Third, if you receive contributor information after the contribution(s) has been reported, you shall either a) file with your next regularly scheduled report, an amended memo Schedule A listing all the contributions for which additional information was received; or b) file on or before your next regularly scheduled reporting date, amendments to the report(s) originally disclosing the contribution(s). (11 CFR §104.7(b)(4))

Please provide the missing information or a detailed description of your procedures for requesting the information. For more information on demonstrating "best efforts," please refer to the Campaign Guide.

-Your committee's filing is not an original. Therefore it does not bear an original signature of the treasurer or designated agent. Please file a report bearing the required original signature. See 2 U.S.C. §434(a)(1) and 11 CFR §104.14.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division). My local number is (202) 694-1130.

Sincerely,

A handwritten signature in cursive script, appearing to read "C. Whyrick".

Christopher A. Whyrick
Reports Analyst
Reports Analysis Division

